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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD IN THE MATTER OF: ) ) Amendments to 35 Ill. ) No. R18-25 Adm. Code, Subtitle E: ) Agriculture Related Pollution)

REPORT OF THE PROCEEDINGS held in the above-entitled cause before HEARING OFFICER TIMOTHY FOX, called by the Illinois Pollution Control Board, 100 West Randolph Street, Chicago, Illinois, on the 6th day of January, 2022, commencing at the hour of 9:00 a.m.

Reported By: Raelene Stamm, CSR License No.: 084-004445 Page 1

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1	APPEARANCES:	
2		
3	MR. TIMOTHY FOX, Hearing Officer (via video)	
4	MS. JENNIFER VAN WIE, Board Member	
5	MS. MARIE TIPSORE, Board General Counsel	
6		
7	ILLINOIS ENVIRONMENTAL PROTECTION AGENCY	
8	BY: MS. SARA TERRANOVA (via video)	
9	1021 North Grand Avenue East	
10	PO Box 19276	
11	Springfield, Illinois 62794	
12	(217) 782-5544	
13	On behalf of the Illinois	
14	Environmental Protection Agency;	
15		
16	HEPLER BROOM, LLC	
17	BY: MS. MELISSA BROWN (via video)	
18	4340 Acer Grove Drive	
19	Springfield, Illinois 62711	
20	(217) 993-6077	
21	On behalf of the Illinois	
22	Environmental Regulatory Group.	
23		
24	ALSO PRESENT: MR. DARIN LECRONE (via video)	

1 HEARING OFFICER FOX: Good morning, and welcome 2 to this Illinois Pollution Control Board hearing. 3 My name is Tim Fox, and I am acting as the hearing officer for this rulemaking in place of the 4 assigned hearing officer, Mark Kaminski. 5 6 This proceeding is entitled, In the Matter 7 of Amendments to 35 Illinois Administrative Code, Subtitle E, Agriculture Related Pollution, and the 8 board docket number for this rulemaking is R18-25. 9 I am the only representative of the Board 10 11 present here in Springfield. I do want to note 12 that Board Member Jennifer Van Wie, the assigned 13 Board member for this ruling, is present on the screen from our Chicago office. 14 15 Member Van Wie, is there anyone else from 16 the Board there in the Chicago office with you? 17 MS. VAN WIE: Marie Tipsore is here along with 18 the court reporter. 19 HEARING OFFICER FOX: Excellent. And if the 20 record will reflect that Marie is our general counsel, please. 21 A couple of basic points, I do want to 22 stress that this hearing is governed by the Board's 23 24 procedural rules so that all information that is

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1	relevant and is not repetitious or privileged will
2	be admitted into the record. Please bear in mind
3	that any questions posed today by the Board or its
4	staff are intended solely to help develop a clear
5	and complete record for the Board's decision and
б	does not reflect any decision on the proposal, any
7	testimony or other questions.
8	For the sake of our court reporter, please
9	speak clearly and avoid speaking at the same time
10	as another person so that we can produce a clear
11	transcript.
12	There is a notepad or sheet in each of
13	these two hearing locations so that anyone who
14	wishes to offer public comment may indicate that
15	they wish to do so.
16	I can see here in Springfield,
17	Member Van Wie, that no one has so indicated. Is
18	there anyone there who wishes to offer a public
19	comment that you're aware of?
20	MS. VAN WIE: No.
21	HEARING OFFICER FOX: Excellent. Thank you for
22	your help.
23	I also want to stress that anyone can
24	submit comments electronically through the clerk's

1 office online or COOL which is available through 2 the Board's website. 3 The notice for this was posted on December 2 of 2021 in the Chicago Sun Times and on 4 December 3 of 2021 in the Journal Register in 5 Springfield. The first hearing in this docket was 6 7 held on November 12 of 2021. In an order on November 30, the hearing officer directed that any 8 pretrial testimony for this second hearing was to 9 have been filed with the Board by December 30 of 10 11 2021, but the Board did not receive pre-filed 12 testimony by that date or since. However, on November 16, 2021, IEPA filed 13 what were entitled, Preliminary Comments, which the 14 15 Board has docketed as Public Comment Number 1 in an 16 order on January 3 of 2022. The assigned hearing 17 officer requested IEPA's response to questions 18 based on that preliminary comment or Public Comment 19 Number 1. 20 I do understand, and I believe Ms. Terranova for the agency will correct me, that 21 the IEPA does not wish to testify today, but they 22 23 do have a witness who is prepared to answer any 24 questions that may arise. And we appreciate his

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Page 6 participation today, and we can turn to that, I 1 2 think, fairly quickly. 3 The proposed order for our hearing today, as simple as it is, I think is worth clarifying. 4 5 We can see, first of all, if anyone has appeared to 6 offer any public comments. Since we don't have any 7 pre-filed testimony, we can turn to the agency's witness for any questions that may come up. Once 8 we have resolved those, we can see whether anyone 9 has appeared to offer a comment that we can take 10 11 care of in simple procedural details before we 12 adjourn for the second hearing. Does that make sense? 13 14 I'm seeing only agreement on that. 15 Why don't we, as I said, begin just to 16 clarify whether there is anyone present here either 17 in Springfield or in Chicago who wishes to offer a public comment. 18 19 Member Van Wie, I can clearly see there is 20 no one here in Springfield that wishes to do so. Is there anyone there who has appeared that wants 21 to comment? 22 23 MS. VAN WIE: No. 24 HEARING OFFICER FOX: Very good. Why don't we

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1	at that point then turn to the witness that the
2	agency has brought to the hearing today. I do
3	understand there are at least a few questions for
4	him. Why don't I begin, first of all, by having
5	Miss Terranova on behalf of the agency identify
б	herself and the witness for the record. We'll ask
7	Miss Brown to do the same for the Illinois
8	Environmental Regulatory Group, and then we can
9	have the witness sworn in very quickly.
10	MS. TERRANOVA: I am Sarah Terranova, it's
11	T-e-r-r-a-n-o-v-a, legal counsel for the Illinois
12	EPA. And here is a witness to answer questions. I
13	have Darin LeCrone for the agency. And I'm just
14	gonna let you state your title.
15	MR. LECRONE: I'm the manager of the Permit
16	Section in the Division of Water Pollution Control,
17	and my last name is spelled L-e-C-r-o-n-e.
18	HEARING OFFICER FOX: Thanks to both of you.
19	Miss Brown, if I may ask you to for the
20	record simply identify yourself.
21	MS. BROWN: Yes. I am Melissa Brown,
22	M-e-l-i-s-s-a, last name Brown, B-r-o-w-n, and I am
23	outside counsel for the Illinois Environmental
24	Regulatory Group, also known as IERG, I-E-R-G.

Page 8 1 HEARING OFFICER FOX: Member Van Wie, that's 2 everyone who's present here. If it makes sense to 3 you, why don't we have the court reporter swear in 4 Mr. LeCrone. MS. VAN WIE: 5 Sounds good. (WHEREUPON, the witness was 6 7 duly sworn.) HEARING OFFICER FOX: Mr. LeCrone, thanks for 8 9 your availability today to answer questions. Miss Brown, I think we can turn to you to 10 11 raise those questions. MS. BROWN: 12 Thank you. 13 DARIN LECRONE, called as a witness herein, having been first duly 14 15 sworn, was examined and testified as follows: 16 EXAMINATION 17 BY MS. BROWN: All right. So as I previously identified 18 ο. 19 myself, I'm Melissa Brown, outside counsel for the 20 Illinois Environmental Regulatory Group. I just have a few questions for you today, Mr. LeCrone. 21 22 So we noted in some of the agency's filings as well as the Board order that these 23 24 proposed revisions are not substantive. And so I

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Page 9 1 guess my first question is whether the agency 2 intended those proposed revisions in this 3 rulemaking to be nonsubstantive cleanup revisions? 4 Α. They're intended to be nonsubstantive 5 cleanup. Cleanup is the language in making it 6 consistent with a more modern way of kind of 7 phrasing some of this, but, yeah, that's the 8 intent. Okay. And are these proposed revisions 9 0. subject to US EPA review and approval? 10 11 Α. I believe they are, yes. I have forwarded 12 them to Region 5 for review and consideration and 13 comment. I have not heard back from them yet. Ι sent that to them December 2 I believe it was. 14 Ι 15 know they have had turnover in their staffing as 16 well, and so they had two staff that was assigned 17 to the post up for Illinois, and they both left Region 5. 18 19 So they're kind of the same boat I am. 20 But it is up there. I haven't got any comments yet but they did express a desire to review and comment 21 on the proposed changes. 22 23 Okay. And prior to submitting the 0. 24 proposed revisions to US EPA on or around

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Page 10 1 December 2, was there any prior back-and-forth 2 communications with US EPA and the agency regarding 3 the proposed revisions? 4 Α. We have regular calls with them regarding 5 our cable program anyway because of a pending 6 withdrawal petition on the cable program approval 7 that's been pending for 10 years or more. So we have regular calls. I think it's guarterly. And 8 so it came up on the last one of those. 9 Ι discussed it with him, told him I would send him a 10 11 link to the Board's docket and did that. And we 12 discussed it in that manner, but then since I forwarded them the information I haven't heard 13 14 anything back. 15 Okay. And to the best of your knowledge, 0. 16 in US EPA's review and hopefully event approval of 17 those proposed revisions, you know, in that process I would assume obviously US EPA's reviewing the 18 19 proposed revisions that are the subject of this rulemaking, but is it possible at that time for 20 US EPA to also kind of take a broader look at these 21 regulations and express any concern about the 22 regulations or provisions as a whole and not just 23 necessarily the proposed minor revisions? 24

1	Do you think that's possible?
2	A. They haven't indicated to me that they
3	intend to do that. I know just from previous
4	conversations there are some sections of our rules
5	that they had earlier concerns with, but I don't
6	they haven't expressed any desire for them to do
7	that. I know that this the changes to these
8	rules are very closely tied to our reissuance of
9	our general permit. A lot of our permit language
10	is directly quoting sections of the regulations.
11	And so we had conversations about the
12	status of our general permit which was ready to be
13	reissued. We had a public hearing. Response to
14	the summary was drafted. We got final approval on
15	the permit for Region 5. And when this rulemaking
16	changes came up, we did go back, and we need to
17	cross we cross-referenced checks to the entire
18	general permit now, and they will need to review
19	that permit again in that context.
20	So they haven't indicated that they're
21	gonna look beyond these substantive changes, but
22	they are gonna look at what the changes may have on
23	the language that's in our draft permit as it
24	currently stands.

Page 12 When you say on these substantive changes, 1 0. 2 do you mean nonsubstantive changes? 3 Α. Yeah, non -- they intended to be 4 nonsubstantive. And, you know, the intent of the 5 Board's proposal and ours was to be nonsubstantive. 6 I'm assuming that Region 5 will have the same 7 opinion, but we haven't gotten any formal comment from them yet. 8 And I saw that in the -- one of the 9 0. agency's filings that they expressed some concern 10 11 that the Board's proposed -- some of the Board's 12 proposed revisions were indeed substantive 13 revisions; is that correct? Well, that's the concern that it was an 14 Α. 15 unintended consequence of some of the changes, that 16 it was intend to be nonsubstantive, but may, in 17 fact, have more of an impact than originally 18 anticipated. So that's something that Region 5 19 expressed a desire to double-check to make sure 20 that that was gonna be the case because so much of our language is supposed to parallel their own, and 21 our permit is supposed to reflect both. 22 23 So that's -- we want to be very careful to make sure that any of these changes don't have any 24

Page 13 1 unintended effect on applicability of some of the 2 part of the reqs. As a process question, if it was, you 3 ο. 4 know, after EPA reviews and it was determined 5 potentially that some of the Board's proposed revisions are indeed substantive, I guess would 6 7 that have any effect on this rulemaking since it's a cleanup rulemaking? 8 I don't honestly know. I was kind of 9 Α. hoping by now we would have had some comments from 10 11 them, but we haven't yet. I know, you know, 12 they're probably like us, and during the month of 13 December nobody's around. So it's -- I'm trying to think -- I don't think I've got another call 14 15 scheduled with them, but I will reach out to them 16 before any post-hearing comments are due and see if 17 we can get any input from them before that so we 18 can reflect that on the responses. 19 But I don't -- I don't honestly know what 20 that would do to this if we would have to come back with another proposal based on their response. 21 Okay. And then is the December 2, that 22 Q. submittal, and then US EPA's review that they're 23 24 conducting around this time, would that be kind of

Page 14 1 a preapproval and formal review? 2 Or, I guess what I'm asking is, once these rules are adopted by the Board, are they then again 3 submitted to the US EPA for a formal review and 4 5 approval? 6 I'm not a hundred percent certain, but Α. 7 that's always been my impression because this is kind of a delegated program kind of thing that we 8 would have to submit something to them formally 9 10 after the Board adopts whatever changes are made. 11 Q. Okay. I know that from the position of the 12 Α. 13 pending withdrawal petition that the environmental 14 groups have filed years ago that they definitely 15 are gonna be involved in any -- with the comments 16 on this because it affects their ability to get rid of that withdrawal petition which is this close to 17 18 being able to do. 19 So the general permit is kind of the last 20 piece of that. So they're being a little extra cautious to make sure that there's no unintended 21 consequences here, you know, before we finalize the 22 permit and all the rest of it. So I'm hoping we 23 24 get some comments from them, if they have any, on

Page 15 1 these proposed changes as soon as we can. 2 Q. Okay. And then just last question is, so, 3 you know, if this is submitted after adopted by the Board to US EPA for formal review and approval, I 4 5 was just wondering do you know generally what time 6 frames are associated with that process? 7 I don't know off the top of my head. And Α. 8 I think it's typically pretty quick if they're 9 aware -- I mean, I want to get any comments they had up front so it wasn't going to be a surprise to 10 11 them after the fact. So if we can -- if they have any comments and we receive them and can address 12 13 those in our post-hearing filings, then hopefully, you know, any kind of formal review from them 14 15 afterwards will be a formality and be a quick 16 turnaround. That's kind of how in general we prefer to 17 18 do those things whether it's, you know, rulemaking 19 or some permit action, to get their comments early 20 so that the final approval process goes a little smoother and quicker. 21 22 MS. BROWN: All right. That is all I have. 23 Thank you very much, Mr. LeCrone. 24 MR. LECRONE: Thank you.

Page 16 HEARING OFFICER FOX: Member Van Wie, if 1 2 there's not another organization or person present that would wish to ask questions of the agency and 3 4 Mr. LeCrone, is there any question you would like 5 to pose? 6 MS. VAN WIE: No, I don't have any questions 7 for the agency. But I'm happy to make a clarifying statement that the Board's proposed changes to the 8 regulations were also intended to be 9 nonsubstantive. We have no intent of making 10 11 substantive changes, so I think it's just a matter 12 of finding language that works for both the Board and Illinois EPA. But the intent was not there to 13 14 make any substantive changes on our end either. 15 HEARING OFFICER FOX: Very good. 16 Member Van Wie, is there anyone else there 17 that they wish to ask a question of the agency? MS. VAN WIE: 18 No. 19 HEARING OFFICER FOX: Very good. We did not 20 have anyone file pretrial testimony. Member Van Wie, I'm sure I've not found on 21 the list here that there's no one who might -- who 22 23 did not pre-file testimony but who is present there 24 that would like to testify today; am I correct

Page 17 1 about that? 2 MS. VAN WIE: That is correct. There's no one 3 here. HEARING OFFICER FOX: Excellent. And neither 4 5 is there anyone here in Springfield. 6 And, Mr. LeCrone, we thank you for your 7 availability to answer questions. I think we can have you figuratively, not literally, step down at 8 this point. 9 I think it's time for us to turn to the 10 11 issue of the economic impact study which is 12 required by the Environmental Protection Act. 13 Section 27B of the Act provides that the Board must 14 request from the Department of Commerce and 15 Economic Opportunity, or DCEO, conduct an economic 16 impact study of proposed rules before the Board 17 The Board then must either make the adopts them. 18 study or the department's explanation for not 19 conducting one available to the public at least 20 20 days before a public hearing such as this one. In a letter dated September 17, 2021, the 21 Board's chair, Barbara Flynn Currie, requested that 22 23 DCEO conduct an economic impact study of this 24 rulemaking proposal, and the Board specifically

Page 18 1 requested a response no later than November 1 of 2 2021. On October 22 of 2021, the Board received 3 4 a response from the acting director of DCEO which 5 respectfully declined to request and perform an 6 economic impact study. 7 Is there anyone either here in Springfield or Chicago who would like to testify regarding the 8 9 Board's request or DCEO's response? I'm neither seeing or hearing any 10 11 indication in Springfield. 12 Member Van Wie, is there anyone there who 13 wishes to testify or comment. 14 MS. VAN WIE: No. 15 HEARING OFFICER FOX: Unsurprisingly. Ι 16 appreciate that. 17 Since we do not have anybody wishing to do so, why don't we, Madam Court Reporter, go guickly 18 19 off the record for a moment or two just to tie up 20 some procedural questions. 21 (WHEREUPON, a discussion was had 22 off the record.) 23 HEARING OFFICER FOX: Thank you. We did take a 24 moment just to go off the record to discuss

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1 procedural issues specifically involving 2 post-hearing comments and the deadline to file 3 those. The Board expects the transcript of this hearing to be available by Friday, January 14th. 4 5 The deadline to file post-hearing comments would be 6 14 days after that date. We will just set it as 7 Friday, October -- Friday, January 28, just to clearly set a date, a deadline for those comments 8 here and place it on the record. 9 We have discussed with the agency a single 10 11 post-hearing comment that wrapped up all of the 12 questions that had arisen at hearing that had 13 arisen in the January 3 hearing officer order and in the Board's original order submitting this to 14 15 public comment, and Miss Terranova, I believe you 16 indicated that that single response wrapping all of 17 that up by January 28 was acceptable; is that 18 correct? 19 MS. TERRANOVA: Yes. 20 HEARING OFFICER FOX: Thank you for your help. Those comments, like any other filings 21 with the Board, must also be served on the hearing 22 23 officer and on those persons who are on the service

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list before filing. Please check on the clerk's

24

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Page 20 1 office online or with the Board's clerk to ensure 2 you have the most recent version of the service 3 list. 4 Just to tie up this loose end, is there 5 anyone there, Member Van Wie, present who may wish 6 to offer a public comment on this proposal? 7 MS. VAN WIE: No. HEARING OFFICER FOX: Neither seeing or hearing 8 any here in Springfield, for the participants here, 9 are there other matters that need to be addressed 10 11 on the record before we adjourn? 12 Not seeing any indication that there are, 13 the second hearing therefore is adjourned. No further hearings are scheduled. 14 15 Mr. LeCrone, in particular, thank you for 16 your participation and responses. 17 We are concluded. Thank you, everyone. 18 (WHEREUPON, the hearing was 19 adjourned at 9:25 a.m.) 20 21 22 23 24

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4	RAELENE STAMM being first duly sworn, on
5	oath says that she is a court reporter doing
6	business in the City of Chicago; and that she
7	reported in shorthand the proceedings of said
8	hearing, and that the foregoing is a true and
9	correct transcript of her shorthand notes so taken
10	as aforesaid, and contains the proceedings given at
11	said hearing.
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14	Certified Shorthand Reporter
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